

UNITED STATES DISTRICT COURT
 DISTRICT OF MINNESOTA
 Criminal No. 19-36 (SRN/HB)

UNITED STATES OF AMERICA,)	
)	DISCOVERY DECLARATION AND
Plaintiff,)	OUTLINE OF PRE-TRIAL MOTIONS
)	
V.)	
)	
HURIAH KAREEM BLEDSOE,)	
)	
Defendant.)	

Huriah Kareem Bledsoe is charged in a four-count indictment with possession with the intent to distribute controlled substances, possession of firearms in furtherance of a drug trafficking crime, felon in possession of a firearm as an Armed Career Criminal and possession of body armor by a violent felon on January 17, 2019. Through counsel, he respectfully offers the following declaration concerning the status of discovery in this case and outline of the pre-trial motions that are being filed.¹

DISCOVERY

Counsel received discovery containing reports, photographs, videos and interviews of Michelle Hall and Mr. Bledsoe. Counsel is filing a discovery motion requesting

¹ This submission is intended as a review of the discovery provided to date and of the discovery and suppression motions filed along with it, and not as a means of avoiding reciprocal discovery obligations under Rule 16 of the Federal Rules of Criminal Procedure. Counsel seeks discovery of all materials to which the defense is entitled under any and all laws, rules and regulations, and do not object to the motions for reciprocal discovery that are now routinely offered by the government.

disclosure of any additional Rule 16 discovery that the government may receive in the future.

MOTIONS

Aside from the discovery motion, Counsel is filing the following motions:

1. Disclosure of 404(b) evidence
2. Disclosure of Brady evidence
3. Disclosure of Expert Testimony
4. Retention of Rough Notes
5. Bill of Particulars
6. To Suppress January 17, 2019 Statement
7. To Suppress Physical Evidence Obtained as a Result of the Search and Seizure of items from Room #228 of the Extended Stay Hotel and from a Grey Mercury Marquise.

Counsel anticipates that the motions to suppress statements (identified as motion #6) will require testimony.

MEET AND CONFER

On July 30, 2019, the undersigned and the government conferred by phone pursuant to and in accordance with L.R. 12. 1 to clarify and narrow issues.

Dated: July 30, 2019

Respectfully submitted,

s/ Manny K. Atwal
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